

Juan Tomasino
 State Bar No. 24033395
 ALLMAND LAW FIRM, P.L.L.C.
 860 Airport Freeway, Suite 401
 Hurst, TX 76054
 214.265.0123 Phone
 214.265.1979 Fax
 ATTORNEY FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE EASTERN DISTRICT OF TEXAS
 SHERMAN DIVISION**

IN RE:

SILBURN RALPH PALMER	§	
	§	
	§	CASE NO. 23-41916
Debtor,	§	
	§	CHAPTER 7
	§	
BOCA RATON 316, LLC D/B/A	§	
TRINITY HEIGHTS	§	
Movant,	§	
	§	
VS.	§	
SILBURN RALPH PALMER	§	
	§	
Respondent.	§	

DEBTOR'S UNOPPOSED RESPONSE TO MOTION FOR RELIEF FROM STAY

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW **SILBURN RALPH PALMER** and , Respondent in the above-styled and numbered cause and in response to the Motion for Relief from Stay of Boca Raton 316, LLC d/b/a Trinity Heights ("Movant") and in regard to the collateral referenced in said Motion, Respondent respectfully shows:

1. Respondent is unopposed to Boca Raton 316, LLC d/b/a Trinity Heights's Motion for Relief from Stay.

WHEREFORE, PREMISES CONSIDERED, Respondent prays for the relief requested and for such other and further relief as the Court may deem just and appropriate.

Dated: December 16, 2024.

Respectfully Submitted,

ALLMAND LAW FIRM, P.L.L.C.

/s/ Juan Tomasino

Juan Tomasino

State Bar No. 24033395

ALLMAND LAW FIRM, P.L.L.C.

860 Airport Freeway, Suite 401

Hurst, TX 76054

214.265.0123 Phone

214.265.1979 Fax

ATTORNEY FOR DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 16, 2024, a true and correct copy of the foregoing *Unopposed Response to Motion For Relief From Stay* was served on the following parties in interest by first class mail:

CHAPTER 7 TRUSTEE

Michelle H. Chow
16200 Addison Road, Suite 140
Addiston, Texas 75001

U.S. TRUSTEE

Office of the U.S. Trustee
110 N. College Ave.
Suite 300
Tyler, TX 75702

DEBTOR

Silburn Ralph Palmer
14401 Stapleton Lane Apt. 1105
Fort Worth, TX 76155

OPPOSING COUNSEL

ANDREWS MYERS, P.C.
1885 Saint James Place, 15th Floor
Houston, Texas 77056

By: /s/ Juan Tomasino
Juan Tomasino
State Bar No. 24033395
ATTORNEY FOR DEBTOR